## **DEKAJLO LAW OFFICES**

OLEH N. DEKAJLO OREST T. DEKAJLO LONG ISLAND OFFICE 1975 Hempstead Turnpike - Suite 101 East Meadow, NY 11554-1703 tel: 516.542.9300 ~ fax: 516.542.9303 email: Dekajlo@aol.com

Filed Via CM-ECF

January 2, 2020

U.S. District Court Judge Kenneth M. Karas United States Courthouse 300 Quarropas St. White Plains, NY 10601 LETTER MOTION

Re: USA v. Hankewycz

Case No.: 7:19-cr-00649-kmk

Dear Judge Karas,

The undersigned is the attorney of record for Defendant, Taras Hankewycz, and submits this letter motion for your respectful consideration to extend the time within which the defendant shall be permitted to file and submit his sentencing submission, and to adjourn the Defendant's sentencing.

The Defendant, Taras Hankewycz, plead guilty on September 6, 2019 before U.S. Magistrate Judge Liza Margaret Smith. Magistrate Judge Smith set <u>Thursday</u>, <u>January 9<sup>th</sup></u>, <u>2020</u> as the date of sentencing.

This office has been requested to submit this application to your Honor to adjourn the sentencing for a period of approximately 42 days, to a date and time convenient for this Court, to any day on or after February 20<sup>th</sup>, 2020.

The Defendant and the undersigned have been fervently preparing the documents for submission for this Court's honorable consideration since the date of plea. During the interim period, and since the date of plea, the Defendant's wife, Adrianna Melmyk Hankewycz, was laid off from her employment, as a result of company downsizing, and not related to the underlying prosecution of her husband.

The Defendant, his wife and their son have been juggling family responsibilities as Mrs. Hankewycz searches for replacement employment while preparing for sentencing.

We respectfully submit that during the entire proceedings of Taras Hankewycz, he has been fully compliant and cooperative with all rules, restrictions and regulations of Pre-Trial Services.

## OLEH N. DEKAJLO

ATTORNEY AND COUNSELOR AT LAW

In speaking and communicating with assistant U.S. Attorney James Ligtenberg assigned to this case, he has indicated that he has no objection to the granting of the relief requested herein.

It is further respectfully submitted to this Court that there would be no prejudice to the Government as a result of the granting of the within Application and Motion.

On behalf of the Defendant, Taras Hankewycz, and his family, we respectfully request that the sentencing be adjourned to a date convenient to the Court on or after Thursday, February 20, 2020.

Respectfully submitted,

OLEH N. DEKAJLO (OD4743)

OND: dh

Granda Sentence is moved to

3 4 120, 7+ 11:00

MICH

Se Oldend.